

Robert C. Ryan (NSBN 7164)
Timothy A. Lukas (NSBN 4678)
Joshua M. Halen (NSBN13885)
HOLLAND & HART LLP
5441 Kietzke Lane, Second Floor
Reno, Nevada 89511
Tel.: (775) 327-3042 / Fax: (775) 786-6179
rcryan@hollandhart.com
tlukas@hollandhart.com
jmhalen@hollandhart.com

Teague I. Donahey (*pro hac vice*)
HOLLAND & HART LLP
800 W. Main Street, Suite 1750
Boise, Idaho 83702-5974
Tel.: (208) 383-3988 / Fax: (208) 473-2976
tidonahey@hollandhart.com

Adam Hosmer Henner (NSBN 12779)
Phil Mannelly (NSBN 14236)
MCDONALD CARANO LLP
100 W. Liberty Street, Tenth Floor
Reno, NV 89501
Tel.: (775) 788-2000
ahosmerhenner@mcdonaldcarano.com
pmannelly@mcdonaldcarano.com

*Attorneys for Defendants CHEMEON Surface
Technology, LLC, Dean Meiling, Madylon Meiling,
DSM Partners, LP, DSM P GP LLC, and Suite B LLC*

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

MARC HARRIS, an individual; on behalf of
himself and all others similarly situated,

Plaintiff,

v.

DEAN MEILING, et. al.,

Defendants.

No. 3:19-cv-00339-MMD-CBC

**STIPULATION AND ORDER FOR
EXTENSION OF TIME TO FILE
RULE 54 BILL OF COSTS AND
MOTIONS FOR FEES AND TO FILE
RESPONSES TO SAME**

[FIRST REQUEST]

Plaintiff and Defendants, by and through their undersigned counsel stipulate
and agree as follows:

1. On November 19, 2019, the Court entered Judgment against Plaintiff

Harris in favor of Defendants (ECF No. 130).

2. Pursuant to Local Rule 54-1(a) (bill of costs) and 54-14(a) (motion for attorney's fees), Defendants bill of costs and motion are due on December 3, 2019, and Plaintiff's objection and opposition would be due on December 17, 2019. Defendants replies to the same would be due on December 24, 2019.

3. The parties hereby stipulate to extend the deadline for Defendants to file their Rule 54-1(a) (bill of costs) and 54-14(a) (motion for attorney's fees) to December 13, 2019. Plaintiff shall have until January 3, 2020 to file his opposition and objection to costs, and Defendants shall file any replies by January 13, 2020.

4. Pursuant to LR 6-1, this first request for an extension is made with good cause and in good faith and not for purposes of delay. The parties in this action have worked to coordinate the timing of filing pleadings in this case and affiliated cases in a consolidated fashion and to account for the availability of counsel over the holiday period. This is the Parties' first request for an extension of time to file their Rule 54-1 (bill of costs) and 54-14 (motion for attorney's fees) and the responsive pleadings to the same. Counsel do not believe that the extension requested would cause any undue delay in this case.

IT IS SO STIPULATED.

DATED this 3rd day of December, 2019.

HOLLAND & HART LLP

SANTORO WHITMIRE

/s/ Timothy A. Lukas
Timothy A. Lukas (NSBN 4678)
Robert C. Ryan (NSBN 7164)
Joshua M. Halen (NSBN 13885)
5441 Kietzke Lane, Second Floor
Reno, Nevada 89511

/s/ Oliver Pancheri, Esq.
Oliver J. Pancheri (NSBN 7476)
Nicholas J. Santoro (NSBN 532)
10100 W. Charleston Blvd., Suite 250
Las Vegas, NV 89135

-and-
Teague I. Donahey (*pro hac vice*)
800 W. Main Street, Suite 1750
Boise, Idaho 83702-5974

Attorneys for Defendant Janet Chubb

-and-
Adam Hosmer Henner (NSBN 12779)
Phil Mannelly (NSBN 14236)
MCDONALD CARANO LLP

///

1 100 W. Liberty Street, Tenth Floor
2 Reno, NV 89501

3 *Attorneys for Defendants Dean Meiling,*
4 *Madylon Meiling, Chemeon Surface*
5 *Technology, LLC, Metalast Surface*
6 *Technology, LLC, D&M-MI, LLC, DSM*
7 *Partners, Ltd., and Meiling Family Partners,*
8 *Ltd.*

9 LIPSON NEILSON, P.C.

10 */s/: Janeen Isaacson*
11 *Janeen Isaacson (NSBN 6429)*
12 *9900 Covington Cross Drive, Ste. 120*
13 *Las Vegas, Nevada 89144*

14 *Attorneys for Kaempfer Crowell, Ltd.*

THE KIM LAW FIRM

/s/: Grace M. Kim, Esq.
Grace M. Kim (NSBN 09268)
10120 S. Eastern Avenue, Ste. 200
Henderson, Nevada 89052
-and-
Marc Y. Lazo (PHV)
K&L Law Group
2646 Dupont Drive, Ste. 60340
Irvine, CA 92612

Attorneys for Plaintiff Marc Harris and
Proposed Class Members

15 **IT IS SO ORDERED.**

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17 **UNITED STATES DISTRICT JUDGE/**

18 DATED: December 4, 2019
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HOLLAND & HART LLP
5441 Kietzke Lane, 2nd Floor
Reno, NV 89511
Phone: (775) 327-3000 ♦ Fax: (775) 786-6179

CERTIFICATE OF SERVICE

Pursuant to FRCP 5, I, Audrey Brown, declare, as follows:

I am employed in the City of Reno, County of Washoe, State of Nevada, by the law offices of Holland & Hart. My business address is 5441 Kietzke Lane, Second Floor, Reno, Nevada 89511. I am over the age of 18 years and not a party to this action.

I am readily familiar with Holland & Hart's practice for collection and processing of: HAND DELIVERIES, FACSIMILES and OUTGOING MAIL. Such practice in the ordinary course of business provides for the delivery or faxing and/or mailing with the United States Postal Service, to occur on the same day the document is collected and processed.

On December 3, 2019, I served the foregoing **STIPULATION AND ORDER FOR EXTENSION OF TIME TO FILE RULE 54 BILL OF COSTS AND MOTIONS FOR FEES AND TO FILE RESPONSES TO SAME [FIRST REQUEST]** as follows:

☒ **ELECTRONIC:** by electronic transmission through the United States District Court's CM/ECF system to the parties below:

Marc Y Lazo, Esq.
mlazo@kllawgroup.com
Grace M. Kim
gkim@kllawgroup.com

Attorneys for Plaintiff and Counterclaim Defendant Marc Harris

Nicholas J. Santoro, Esq.
Oliver J. Pancheri, Esq.
nsantoro@santoronevada.com
opancheri@santoronevada.com

*Attorney for Defendants Janet Chubb, Tiffany Schwartz,
Armstrong Teasdale LLP*

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct, and that this declaration was executed on December 3, 2019.

/s/ Audrey Brown
An Employee of Holland & Hart, LLP

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